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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11
12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 ADAM SHAFI,
Defendant

NO. 15 Cr. 582 WHO

UNOPPOSED ADMINISTRATIVE
MOTION AND [PROPOSED] ORDER
SEALING EX PARTE COURT
DOCUMENTS

Date: February 18, 2016
Time: 1:30 p.m.

17 PLEASE TAKE NOTICE that on February 18, 2016 at 1:30 p.m., defendant
18 Adam Shafi will move this Court to file *ex parte* and under seal and FILTER 00002
19 through FILTER 00009, which counsel has lodged with this Court under seal. The
20 government does not oppose the motion and the parties agree that the motion may be
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1 granted pursuant to this unopposed motion and the declaration of counsel below, and
2 without oral argument.

3 Mr. Shafi seeks an order permitting him to file under seal and *ex parte* from the
4 prosecution FILTER 00002 through 00009 because they contain privileged attorney-
5 client communications and constitute attorney work-product. *See* L.R. 56-1(b).

6 **Declaration of Counsel**

7 1. Along with Joshua L. Dratel, I represent Mr. Adam Shafi in the above-
8 captioned matter and I submit this declaration in support of Mr. Shafi's Unopposed
9 Administrative Motion to Seal Court Documents. I present the following based on
10 information and belief.

11 2. Mr. Shafi was arrested on a Complaint July 3, 2015, that alleged an attempt
12 to provide material support to a foreign terrorist organization in violation of 18 U.S.C. §
13 2339B. [Dkt. 1]. Mr. Shafi has been detained since his arrest at Alameda County's Glenn
14 Dyer Jail.

15 3. According to Alameda County Sheriff's Office Lieutenant Dan Brodie, on
16 December 17, 2015, representatives of the Sheriff's Office searched Mr. Shafi's cell and
17 confiscated a notepad containing writings and drawings, which it promptly turned over to
18 the FBI. [Dkt. 47 at ¶¶7-9].

19 4. FBI Agent Christopher Monika confirms that the Alameda County Sheriff's
20 Office provided the material to the FBI. [Dkt. 38-1 at ¶ 5b].

Certificate of Service

I hereby certify that on February 10, 2016, I filed the foregoing **UNOPPOSED ADMINISTRATIVE MOTION AND [PROPOSED] ORDER SEALING COURT DOCUMENTS** with the Clerk of the United States District Court for the Northern District of California by using the CM/ECF system.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 10, 2016.

s/Erik B. Levin
Erik B. Levin, Esq.